

**STATEMENT OF BASIS (AI No. 42082)**

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0101591** to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Ruston Aviation, Inc.  
Ruston Regional Airport Maintenance and Storage Facility  
Post Office Drawer 250  
Ruston, LA 71273

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Lisa Kemp

**DATE PREPARED:** February 17, 2009

**1. PERMIT STATUS****A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

**B. LPDES permits –**

LPDES permit effective date: May 1, 2004

LPDES permit expiration date: April 30, 2009

This permit was modified effective June 3, 2008 to reflect the change in ownership from Louisiana Aircraft, Inc. to Ruston Aviation, Inc.

**C. Date Application Received:** October 29, 2008; additional information received on February 11, 2009.**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - aircraft maintenance and storage facility**

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The facility periodically cleans the exteriors of aircraft, other vehicles (cars, ATVs, etc.), and engine parts. The facility washes approximately four planes per week.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: II
4. SIC code: 4581

**C. LOCATION - 128 Flightline Drive, Ruston, Lincoln Parish**  
Latitude 32° 30' 35", Longitude 92° 35' 24"

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3. **OUTFALL INFORMATION**

Outfall 001

Discharge Type: treated sanitary wastewater from the two sewage treatment plants located northwest of the main aircraft hangar/maintenance facility  
Treatment: aerobic sewage treatment plant  
Location: at the point of discharge from the pipe located northwest of the main aircraft hangar/maintenance facility and south of Outfall 002 prior to combining with any other waters  
Flow: 750 GPD  
Discharge Route: into Choudrant Creek via local drainage

Outfall 002

Discharge Type: exterior vehicle, aircraft, and engine parts washwater  
Treatment: oil/water separator  
Location: at the point of discharge from the pipe located northwest of the main aircraft hangar/maintenance facility and north of Outfall 001 prior to combining with any other waters  
Flow: 50 GPD  
Discharge Route: into Choudrant Creek via local drainage

Outfall 003

Discharge Type: treated sanitary wastewater and exterior vehicle, aircraft, and engine parts washwater  
Treatment: aerobic sewage treatment plant (sanitary) and oil/water separator (washwater)  
Location: at the point of discharge from the pipe located west of the Davison Hangar prior to combining with any other waters  
Flow: 200 GPD  
Discharge Route: into Choudrant Creek via local drainage

Outfall 004

Discharge Type: treated sanitary wastewater  
Treatment: aerobic sewage treatment plant  
Location: at the point of discharge from the sewage treatment facility located northwest of the S.L. Stuckey Terminal Building, prior to combining with any other waters  
Flow: 750 GPD  
Discharge Route: into Choudrant Creek via local drainage

Other Discharges

Stormwater discharges are covered by the Stormwater Pollution Prevention Plan (SWP3) required by Multi-Sector General Permit LAR05N179 issued to the Ruston Regional Airport, which is owned by the City of Ruston.

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#### 4. RECEIVING WATERS

STREAM - Choudrant Creek via local drainage

BASIN AND SEGMENT - Ouachita Basin, Segment 080605

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- g. outstanding natural resources\*

\* Applies to Bayou D'Arbonne, not to tributaries or distributaries per LAC 33:IX.1111

#### 5. TMDL STATUS

Subsegment 080605, Bayou D'Arbonne - from Bayou D'Arbonne Lake to Ouachita River, is listed on LDEQ's Final 2006 303(d) List as impaired for dissolved oxygen (EPA - category 5). To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Ouachita Basin, those suspected causes for impairment which are not directly attributed to the aircraft maintenance and storage facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

The discharges of treated sanitary wastewater, and exterior vehicle, aircraft, and engine part washwater have the potential to discharge pollutants associated with the dissolved oxygen impairment. Compliance with the BOD<sub>5</sub> and COD limitations in this permit should not cause or further contribute to the low dissolved oxygen impairment.

#### 6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

-----Changes from the previous permit:-----

1. The ownership has changed from Louisiana Aircraft, Inc. to Ruston Aviation, Inc.
2. Outfall 001:
  - a. Monthly Average limitations have been included for BOD<sub>5</sub>, TSS, and Fecal Coliform at Outfall 001 based on the Class I Sanitary General LPDES permit, LAG530000, effective December 1, 2007. Fecal Coliform has been changed from Weekly Average to Daily Maximum based on current LDEQ guidance for similar facilities.
  - b. The monitoring frequency for Outfall 001 has been increased from 1/6 months to 1/quarter due to effluent limitations violations.
3. Outfall 002:
  - a. The outfall description has been changed to include exterior vehicle washing.
  - b. The monitoring frequency for Outfall 002 has been increased from 1/quarter to 1/month due to effluent limitations violations.

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4. Outfall 003 – the outfall description has been changed to include exterior vehicle washing.
5. Outfall 004 has been added for the discharge of treated sanitary wastewater from the Stuckey Terminal Building.

## 7. COMPLIANCE HISTORY/COMMENTS

- A. OEC – There are no open, appealed, or pending OEC enforcement actions as of February 11, 2009.
- B. DMR Review/Excursions – DMRs were reviewed for the period June, 2006 through December, 2008. Most reported “No Discharge.” The following excursions were noted:

Date	Parameter	Outfall	Reported Value	Permit Limits
Dec., 2007	BOD5	001	54 mg/L	45 mg/L
	Fecal Coliform	001	1,290,000 col/100ml	400 col/100ml
	COD	002	641 mg/L (monthly avg)	200 mg/L
	COD	002	641 mg/L (daily max)	300 mg/L
	Oil & Grease	002	25 mg/L	15 mg/L
Mar., 2007	Fecal Coliform	003	760 col/100ml	400 col/100 ml
	COD	002	663 mg/L (monthly avg)	200 mg/L
	COD	002	663 mg/L (daily max)	300 mg/L
Dec., 2006	BOD5	001	69 mg/L	45 mg/L

- C. Inspections – An inspection performed on May 22, 2008 revealed the following:
  1. The facility had permit excursions at Outfalls 001, 002, and 003.
  2. The City of Ruston maintains the facility’s SWP3 and it was last updated in 2002.
  3. No disinfection was noted on sanitary wastewater outfalls.
  4. No SPC plan is present on site.
  5. The fueling operations are operated and maintained by Ruston Aviation, Inc. (formerly Louisiana Aircraft, Inc.) per lease agreement with the City of Ruston.

## 8. EXISTING EFFLUENT LIMITS

### Outfall 001 – treated sanitary wastewater

Pollutant	Limitation		Frequency
	Monthly Avg	Weekly Avg	
	mg/L		
Flow	Report	Report	semiannually
BOD <sub>5</sub>	---	45	semiannually
TSS	---	45	semiannually
Fecal Coliform colonies/100ml	---	400	semiannually
pH, s.u.	6.0 (min)	9.0 (max)	semiannually

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**Outfall 002 – aircraft and engine part wastewater**

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	1/quarter
COD	200	300	1/quarter
TSS	---	45	1/quarter
Oil & Grease	---	15	1/quarter
Soaps & Detergents	Inventory Record	---	1/quarter
pH, s.u.	6.0 (min)	9.0 (max)	1/quarter

**Outfall 003 – treated sanitary wastewater and aircraft and engine part wastewater**

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	1/quarter
BOD <sub>5</sub>	---	45	1/quarter
COD	200	300	1/quarter
TSS	---	45	1/quarter
Oil & Grease	---	15	1/quarter
Fecal Coliform colonies/100ml	---	400	1/quarter
Soaps & Detergents	Inventory Record	---	1/quarter
pH, s.u.	6.0 (min)	9.0 (max)	1/quarter

## 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 080605 of the Ouachita Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

## 10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

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## **11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

## **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for Ruston Aviation, Inc.

#### 1. Outfall 001 - treated sanitary wastewater (estimated flow is 750 GPD)

Pollutant	Limitation		Reference
	Monthly Avg.	Weekly Avg.	
	mg/L		
Flow	---	Report	
BOD <sub>5</sub>	30	45	Previous permit, Similar discharges* (BPJ), LAG530000
TSS	30	45	Previous permit, Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400 (Daily Max)	Previous permit, Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Previous permit, Similar discharges* (BPJ), LAG530000

**Treatment:** aerobic sewage treatment plant

**Monitoring Frequency:** 1/quarter for all parameters at the point of discharge from the STP prior to mixing with other waters. Monitoring frequency has been increased due to effluent limitations violations (see Compliance History, Page 4).

**Limits Justification:** Limits and monitoring frequencies are based on the previous permit and/or current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007.

\* Existing permits for similar outfalls

#### 2. Outfall 002 - exterior vehicle, aircraft, and engine parts washwater (estimated flow is 50 GPD)

Pollutant	Limitation		Reference
	Monthly Avg.	Daily Max.	
	mg/L		
Flow	Report	Report	
COD	200	300	Previous permit, Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Previous permit, Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Previous permit, Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Previous permit, Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Previous permit, Similar discharges*, LAG480000 (BPJ)

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**Treatment:** oil/water separator

**Monitoring Frequency:** 1/month at the point of discharge from the pipe located northwest of the main aircraft hangar/maintenance facility prior to mixing with other waters. Monitoring frequency has been increased due to effluent limitations violations (see Compliance History, Page 4).

Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

**Limits Justification:** Limits and monitoring frequencies are based on the previous permit, current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

\* Existing permits for similar outfalls

3. **Outfall 003** – treated sanitary wastewater and exterior vehicle, aircraft, and engine parts washwater (estimated flow is 200 GPD)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	200	300	Previous permit, Similar discharges*, (BPJ), LAG480000
BOD <sub>5</sub>	---	45	Previous permit, Similar discharges*, (BPJ), LAG480000
TSS	---	45	Previous permit, Similar discharges*, (BPJ), LAG480000
Oil & Grease	---	15	Previous permit, Similar discharges*, (BPJ), LAG480000
Fecal Coliform colonies/100ml	--	400 (Daily Max)	Previous permit, Similar discharges* (BPJ), LAG480000
Soaps & Detergents	Inventory Record	---	Previous permit, Similar discharges*, (BPJ), LAG480000
pH, s.u.	6.0 (min)	9.0 (max)	Previous permit, Similar discharges*, (BPJ), LAG480000

**Treatment:** aerobic sewage treatment plant (sanitary) and oil/water separator (washwater)

**Monitoring Frequency:** quarterly at the point of discharge from the pipe located west of the Davison Hangar prior to mixing with other waters. Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

**Limits Justification:** Limits and monitoring frequencies are based on the previous permit, current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001.



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\* Existing permits for similar outfalls

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are retained from the previous permit at Outfalls 002 and 003.

4. **Outfall 004** – treated sanitary wastewater (estimated flow is 750 GPD)

Pollutant	Limitation		Reference
	Monthly Avg	Weekly Avg	
	mg/L		
Flow	---	Report	
BOD <sub>5</sub>	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400 (Daily Max)	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

**Treatment:** aerobic sewage treatment plant

**Monitoring Frequency:** Semiannually for all parameters at the point of discharge from the STP prior to mixing with other waters.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007.

\* Existing permits for similar outfalls

BPJ      Best Professional Judgement  
su      Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.